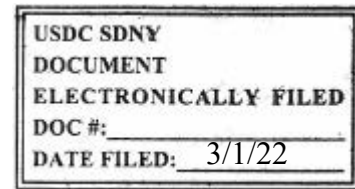




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February 28, 2022

VIA ECF

Hon. Alison J. Nathan, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, New York 10007

**Re: Krichmar v. The Standard Hospitality Group LLC, et al., 21-cv-1596 (AJN)**  
**Joint Motion to Set Schedule for Summary Judgment Motions**

Dear Judge Nathan:

We represent Standard High Line Employer, LLC, a Defendant in the above-referenced action. We write jointly with Plaintiff to request that the Court set the following schedule for the filing of summary judgment motions in this action:

- Summary judgment motions to be filed on or before May 13, 2022;
- Oppositions to any summary judgment motions to be filed on or before June 27, 2022; and
- Reply briefs in further support of any summary judgment motions to be filed on or before July 27, 2022.

Summary judgment motions are currently scheduled to be filed thirty days after the close of all discovery in this action, on or before April 14, 2022. The parties are scheduled to participate in a settlement conference before Magistrate Judge Sarah Netburn on March 14, 2022. Granting this requested adjournment of this deadline and approving this requested briefing schedule will allow the parties sufficient time to prepare summary judgment motions following the conference should a settlement not be reached. This is the first request for an

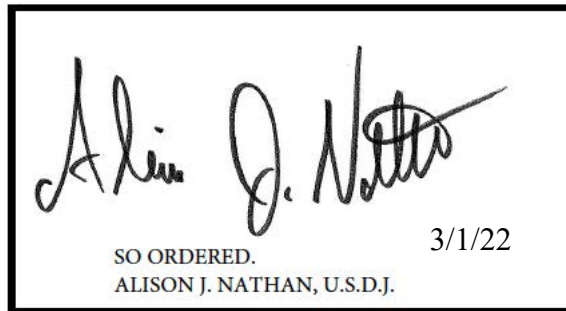
A Pennsylvania Limited Liability Partnership



Hon. Alison J. Nathan, U.S.D.J.

February 28, 2022

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adjournment of the summary judgment motion deadline. Counsel for Plaintiff Igor Krichmar has consented to this request.

We thank the Court for its attention to this matter.

Respectfully submitted,

*/s/ Alexander W. Bogdan*

Alexander W. Bogdan